

AO 91 (Rev. 11/11) Criminal Complaint

United States Courts
Southern District of Texas

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UNITED STATES DISTRICT COURT

for the

Southern District of Texas

FILED

October 25, 2022

Nathan Ochsner, Clerk of Court

United States of America

v.

Case No. M-22-2071-M

Aaron SUAREZ-GUERRA
YOB: 1992 (USA)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 30, 2021 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 841 & 846

Possession with the Intent to Distribute and Conspiracy to Possess with the
Intent to Distribute Cocaine, approximately 23.18 kilograms, a Schedule II
controlled substance.

This criminal complaint is based on these facts:

(See Attachment A)

☒ Continued on the attached sheet.

Approved by: Patricia Cook Profit, AUSA

/s/ Jose Rodriguez

Complainant's signature

Jose Rodriguez, Texas DPS CID Special Agent

Printed name and title

☐ Sworn to before me and signed in my presence.☒ Sworn to before me telephonically.Date: October 25, 2022 5:03 PM

Judge's signature

City and state: McAllen, Texas

Nadia S. Medrano, U.S. Magistrate Judge

Printed name and title

Attachment A

1. On August 30, 2021, at approximately 6:10 PM, Texas Department of Public Safety (DPS) Texas Rangers were conducting surveillance near the Rio Grande River, just south of Eagle Street in Roma, Texas. At this time, a Texas Ranger observed via aerial surveillance fifteen (15) subjects on the south side of the Rio Grande River carrying two (2) rafts. A Texas Ranger observed that two (2) of the subjects were also carrying bundles of suspected narcotics. Moments later, the Texas Ranger witnessed the subjects load the suspected narcotics into the rafts, enter the rafts, and paddle north across the Rio Grande River. A Texas Ranger maintained aerial surveillance on the subjects as the subjects made landfall on the riverbanks of the United States and continued forward carrying the suspected narcotics to the rear of a tan metal building located north of the Rio Grande River near Eagle Street in Roma, Texas. Moments later, the Texas Ranger observed a maroon over tan Ford F-150 extended pickup truck depart from behind the tan metal building at a high rate of speed. At this time, Texas Rangers maintained aerial surveillance on the Ford F-150. A Texas Ranger observed the Ford F-150 travel north on Eagle Street, then make an abrupt west turn into an alleyway located between Hawk Street and Quail Street. A Texas Ranger witnessed a male subject, later identified as _____, exit the Ford F-150 and place two (2) backpacks into the trunk of a gray 2015 Volkswagen Jetta bearing Texas buyers tags 24510S2 that was parked in the property of 2850 Quail Street, Roma, Texas. Seconds later, a Texas Ranger observed _____ enter back into the Ford F-150 and depart the area.

2. Moments later, Texas Rangers and United States Border Patrol (USBP) Agents arrived at 2850 Quail Street and made contact with Melina Rodriguez-Alvarez (Rodriguez-Alvarez), who was sitting on a picnic table outside of 2850 Quail Street. Rangers and USBP Agents subsequently requested and received consent from Rodriguez-Alvarez to search the Volkswagen Jetta. A search of the vehicle trunk resulted in the discovery of two (2) backpacks. Upon further search of the two (2) backpacks, Agents discovered twenty-five (25) brick shaped packages wrapped in black and silver tape, containing a white powdery substance, believed to be cocaine.

3. At this time, Texas DPS Criminal Investigations Division (CID) Special Agents responded to assist with the investigation. Texas DPS CID Agents were granted consent by the property owner, Lizeth Aurora Vasquez, to search a Digital Video Recorder (DVR) utilized at the residence. Texas DPS CID Agents also conducted an interview with Rodriguez-Alvarez, to which she (Rodriguez-Alvarez) stated that she (Rodriguez-Alvarez) witnessed

driving the Ford F-150, unload the two (2) backpacks from the Ford F-150, and place the two (2) backpacks containing suspected narcotics into the trunk of the Volkswagen Jetta that was parked inside the property of 2850 Quail Street.

4. On October 6, 2021, Texas DPS CID Agents received the extracted video footage from the seized DVR and corroborated Rodriguez-Alvarez's statement made during Rodriguez-Alvarez's interview. Time stamped at 5:55 PM, DVR footage shows and Aaron SUAREZ-GUERRA sitting on a picnic table outside of Aaron SUAREZ-GUERRA's residence (2850 Quail Street, Roma, Texas) conversing. At 5:59 PM, DVR footage shows a silver extended cab Ford pickup truck arrive at 2850 Quail Street. At this time,

enters the front passenger seat of the silver Ford pickup truck and departs the area. At 6:07 PM, DVR footage shows Aaron SUAREZ-GUERRA moving the Volkswagen Jetta from the front yard to the back of his (Aaron SUAREZ-GUERRA's) property in a position where the Volkswagen Jetta's trunk would be facing the alleyway. Footage shows Aaron SUAREZ-GUERRA opening the trunk of the Volkswagen Jetta and placing a cowboy hat as a counterweight on top of the trunk, so the trunk stays down but not closed shut, giving

easy access to the Jetta's trunk. The Volkswagen Jetta is registered to Aaron SUAREZ-GUERRA. At 6:09 PM, DVR footage shows Aaron SUAREZ-GUERRA leaving 2850 Quail Street in a black Dodge Challenger. At 6:48 PM, DVR footage show

driving a maroon over tan Ford F-150 in the alleyway, located between Hawk Street and Quail Street. then places the two (2) backpacks containing the suspected cocaine inside the trunk of the Volkswagen Jetta.

5. A Texas DPS laboratory report later showed that the twenty-five (25) bricks containing a white powdery substance seized from the Volkswagen Jetta on August 30, 2021 tested positive for cocaine and weighed approximately 23.18 kilograms.